

EXHIBIT 108

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

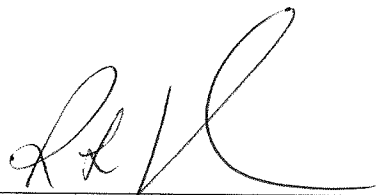
I, R.L. Hughes, hereby declare as follows:

1. I am the Chief of Police for the Georgetown Police Department of Delaware. I have been in this role for 2 years.
2. Prior to my role as Chief of Police for the Georgetown Police Department, I was the Chief Deputy for the Delaware Department of Safety and Homeland Security for 5-1/2 years. I was also with the Delaware State Police for 24 years, retiring in July 2009 as the Administrative Major.
3. The Georgetown Police Department of Delaware is dedicated to protect all members of our community by providing contemporary police services. To this end, the Georgetown Police Department utilizes the principles of the 21st Century Policing Model. We are not Federal immigration officers, but rather, a full service, community oriented, professional law enforcement agency that takes great pride in developing trust-based relationships with our constituents. We are the sole provider of police services to the residents and visitors of Georgetown, Delaware.
4. The community that we serve in Delaware has one of the highest percentages of Hispanic people per capita in the State of Delaware.
5. Currently, the Georgetown Police Department of Delaware's immigration-related work includes assisting victims of crime with obtaining "U" visa status, temporary housing, financial assistance, mental health counseling, employer intervention, referrals to medical and legal providers. Furthermore, we work diligently to enhance trust-based relationship with our immigrant community to combat all types of crime.
6. Upon information and belief, the rescission of Deferred Action for Childhood Arrivals ("DACA") will significantly affect this community.
7. Immigrants are important members of the community and are integral to effective criminal justice. My department functions better when it has the trust and open communication with its constituents. In many circumstances, immigrants are essential witnesses to crimes. Without their cooperation, criminal justice would be negatively impacted.
8. During the campaign and since the election of the current Administration, I have noticed that immigrant victims and witnesses of crimes are sometimes less likely to cooperate—or fear that they cannot cooperate—with law enforcement out of fear of federal immigration enforcement or deportation of themselves or relatives. As Chief of Police, I am concerned that the fear will only escalate in the Hispanic community that I serve to protect if DACA is rescinded.
9. If a significant portion of our community is fearful to engage with law enforcement to report and bear witness to crimes, competent police services will be hampered, thereby making Delaware less safe.

10. Domestic Violence Coordinating Council (DVCC) was created by statute, at 13 *Del. C.* § 2101 *et seq.*, in 1993 in order to improve Delaware's response to domestic violence. The Georgetown Police Department and the DVCC recognizes the chilling effect that will likely occur if DACA is rescinded. The DVCC and the Georgetown Police Department have partnered to provide quality Domestic Violence and Sexual Assault investigations by funding and hiring a Victim Services Specialist and Investigator. Without this partnership, we fear that Domestic Violence incidents and Sexual Assaults would go unreported resulting in even more victims of these crimes. If DACA is rescinded, I believe members of our Hispanic community will be less likely to report crimes and assist us in our public safety mission.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 27 day of September, 2017.



R.L. Hughes
Chief of Police
Georgetown Police Department